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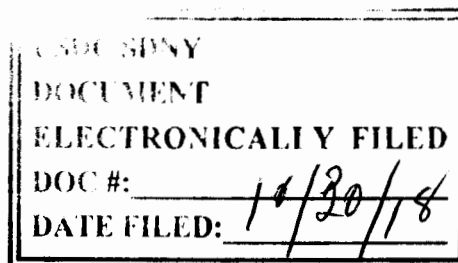
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EDWARD BENNETT WILLIAMS (1926-1988)  
PAUL R. CONNOLLY (1922-1979)

October 29, 2018

**VIA FACSIMILE (212) 805-6382**The Honorable Victor Marrero  
United States District Judge  
500 Pearl Street, Suite 1040  
New York, NY 10007**Re: *Coventry Capital v. EEA*, No. 17-cv-07417(VM)(HBP)**

Dear Judge Marrero:

I write on behalf of Plaintiff Coventry Capital US LLC ("Coventry"). During the October 19, 2018 hearing on Coventry's motion for a preliminary injunction, the Court directed the parties to confer regarding the prospects for a mediation or other discussion regarding settlement of this litigation. The Court ordered the parties to inform the Court of the potential for such discussions within 10 days of the October 19 hearing. That deadline is today.

As Coventry's counsel stated in response to the Court's questioning during the hearing, Coventry is open to a mediation or other settlement discussion. Accordingly, on October 22, 2018, I emailed counsel for Defendants EEA Life Settlements, Inc., Hiren Patel, and Vincent Piscaer, concerning Defendants' amenability to such a discussion. Ex. 1.

Defendants responded this afternoon, stating that "[p]rior to considering any mediation, the Defendants request that Coventry provide them with a settlement proposal and suggested framework." Ex. 1. The undersigned will promptly confer with Coventry and Defendants regarding this request and, barring contrary instructions, will update the Court as to the status of the parties' discussions as they progress. It is our understanding that Coventry's motion for a preliminary injunction will remain pending during the parties' discussions.

The Clerk of Court is directed to enter into the public record of this action the letter above submitted to the Court by

*plaintiff. The Court's ruling on plaintiff's motion for injunctive relief SO ORDERED. will remain under consideration pending the parties' settlement discussions.*

DATE 10-29-18 VICTOR MARRERO, U.S.D.J.

Respectfully submitted,

Kenneth J. Brown

cc: Counsel of record (by email)

# Exhibit 1

**From:** Penaro, Steve  
**To:** Brown, Kenneth; Geercken, Karl; Kuan, Kristen; [hyland@sewkis.com](mailto:hyland@sewkis.com); [koepp@sewkis.com](mailto:koepp@sewkis.com); [millerl@sewkis.com](mailto:millerl@sewkis.com)  
**Cc:** Ashworth, William; Hazelwood, Benjamin  
**Subject:** RE: Coventry Capital US LLC v. EEA Life Settlements, Inc. et al., Case No. 17-cv-7417(VM)(HBP)  
**Date:** Monday, October 29, 2018 12:10:13 PM

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Ken,

Thanks for your message. We have conferred with the Individual Defendants on your mediation request below. Prior to considering any mediation, the Defendants request that Coventry provide them with a settlement proposal and suggested framework. If your client is interested in conveying a settlement proposal and suggested framework at this time, please let us know and we would be happy to schedule a call early this week to further discuss.

Regards,  
Steve

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**From:** Brown, Kenneth [<mailto:KBrown@wc.com>]  
**Sent:** Monday, October 22, 2018 10:39 AM  
**To:** Geercken, Karl <[Karl.Geercken@alston.com](mailto:Karl.Geercken@alston.com)>; Penaro, Steve <[Steve.Penaro@alston.com](mailto:Steve.Penaro@alston.com)>; Kuan, Kristen <[Kristen.Kuan@alston.com](mailto:Kristen.Kuan@alston.com)>; [hyland@sewkis.com](mailto:hyland@sewkis.com); [koepp@sewkis.com](mailto:koepp@sewkis.com); [millerl@sewkis.com](mailto:millerl@sewkis.com)  
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**Subject:** Coventry Capital US LLC v. EEA Life Settlements, Inc. et al., Case No. 17-cv-7417(VM)(HBP)

Karl/Mark,

Following up on Judge Marrero's directive at Friday's hearing, please let us know whether Defendants are amenable to participating in a mediation in the *Coventry Capital v. EEA* dispute.

Thanks very much,

Ken

Kenneth J. Brown  
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